

1 ANGELA H. DOWS, ESQ.
2 Nevada Bar No. 10339
3 adows@premierlegalgroup.com
4 PREMIER LEGAL GROUP
5 1333 North Buffalo Drive, Suite 210
6 Las Vegas, Nevada 89128
7 Telephone: (702) 794-4411
8 Facsimile: (702) 794-4421
9 *Pro Bono Counsel Referred*
10 *via the Legal Aid Center of Southern Nevada*
11 for Plaintiff HYRUM JOSEPH WEST

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 ***

10 HYRUM JOSEPH WEST,)	
)	2:13-cv-00271-APG-VCF
11 Plaintiff,)	
)	
12 v.)	<u>UNOPPOSED MOTION FOR</u>
)	<u>EXTENSION FO TIME TO FILE</u>
13 NYE COUNTY, et al.,)	<u>REPLY TO MOTION TO</u>
)	<u>COMPEL DISCOVERY AND</u>
14 Defendants.)	<u>FOR SANCTIONS THEREON</u>
)	(First Request)

15 _____
16 Plaintiff HYRUM JOSEPH WEST, by and through his pro bono counsel of record,
17 Angela H. Dows, Esq., from Premier Legal Group, respectfully requests that this Court grant
18 Plaintiff an extension of time of approximately one week or until on or before Monday, May 6,
19 2019 to file a reply to his motion to compel. (*See* ECF No. 102.) This Unopposed Motion is
20 based upon the attached points and authorities and all pleadings and papers on file herein.
21

22 DATED this 26th day of April, 2019.

23 PREMIER LEGAL GROUP
24 By: /s/ Angela H. Dows
25 ANGELA H. DOWS, ESQ.
26 *Pro Bono Counsel Referred*
via the Legal Aid Center of Southern Nevada
for Plaintiff HYRUM JOSEPH WEST

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6

- 2
- 3
- 4

- 6
-
- 7

8

9
0
1
2
3
4

- 5
6
7

9
20
21
22

24
25
26

1 5. On April 19, 2019, Defendants filed their response to the motion to compel, as
2 well as a motion to file under seal certain information.

3 6. On April 26, 2019, the current due date for the reply brief and following a
4 request for said information, instant counsel was provided with a copy of the under seal
5 information, including electronic correspondences in support of Defendant's response.
6

7 7. Instant counsel thus requests approximately one week, or on or before May 6,
8 2019 to file the reply due to: (1) needing to review the information recently provided that was
9 filed under seal, (2) confer with her client thereto, and (3) formulate a reply based upon the
10 information.
11

12 8. That the instant Motion is not being prepared or filed under any bad faith, or
13 lack of due diligence.

14 9. That on or about April 25 and 26, 2019, instant counsel conferred with
15 Defendants' counsel, Jon B. Lee, Esq., regarding the proposed extension. Said counsel advised
16 that he did not oppose said request.
17

18 10. That Plaintiff does not have an objection to said extension, and said request
19 encapsulates Plaintiff wishes as to the anticipated timeline.
20
21
22
23
24
25
26

1 **CONCLUSION**

2 That, accordingly, instant counsel respectfully requests an additional approximately one
3 week, or on or before Monday, May 6, 2019 by which to file a Reply to his Motion to Compel.
4
5 (see Doc. No. 102.)

6 DATED this 26th day of April, 2019.

7 Respectfully submitted,

8 By /s/
9 ANGELA H. DOWS, ESQ.
10 PREMIER LEGAL GROUP
11 1333 North Buffalo Drive, Suite 210
12 Las Vegas, Nevada 89128
13 Attorney for Plaintiff Hyrum Joseph West
14
15
16

17 **IT IS SO ORDERED.**

18 

19 **UNITED STATES MAGISTRATE JUDGE**

20 **DATED: 5-1-2019**
21
22
23
24
25
26

1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6

2

3

4

5

6